

# EXHIBIT 69

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2

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1 November 7, 2023

2 P R O C E E D I N G S

3 -o0o-

4 VIDEOGRAPHER: Good morning. We are going  
5 on the record on November 7, 2023 at 9:41 a.m. This is  
6 the recorded deposition of Judd Oostyen in the matter  
7 of Brayden Stark versus Patreon, Inc., filed in the  
8 United States District Court, Northern District of  
9 California, San Francisco division. The case number is  
10 322-cv-03131-JCS. The location of this deposition is  
11 at Ray Quinney & Nebeker in Salt Lake City, Utah.

12 My name is Stewart Smith. I'm the  
13 videographer. The court reporter is Abby Johnson.

14 Will the counsel please state their names  
15 and who they represent for the record.

16 MR. WALKER: My name is Nathan Walker, and  
17 I'm with the Norton Law Firm. And I represent  
18 Defendant Patreon in the litigation. And I'm here with  
19 my colleague Celine Purcell, also with the Norton Law  
20 Firm also representing Patreon.

21 MR. GAA: Reid Gaa from Girard Sharp on

22 behalf of the plaintiff along with my colleague,

23 Anthony \*Regari.

24 VIDEOGRAPHER: Thank you. Will the court

25 reporter please swear in the witness.

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1 Thereupon --

2 JUDD OOSYTEN,

3 was called as a witness, and having been first duly

4 sworn to tell the truth, the whole truth, and nothing

5 but the truth, testified as follows:

6 VIDEOGRAPHER: Thank you, you may proceed.

7 EXAMINATION

8 BY MR. WALKER:

9 Q. Good morning. My name is Nathan walker.

10 And I'm an attorney. And I represent Patreon in this

11 litigation. And I'm going to be asking you some

12 questions here today?

13 A. Mm-hmm.

14 Q. Okay?

15 A. Yeah.

16 Q. Would you please state your name for the

17 record?

18 A. My name is Judd Oostyen.

12 A. A handful of pages.

13 Q. These are documents that came -- that were  
14 provided to you by your counsel?

15 A. Yes.

16 Q. Okay. Other than those documents, are you  
17 able to identify any documents that you reviewed to  
18 prepare for your deposition here today?

19 A. Not -- nothing else other than I have  
20 already done so.

21 Q. Okay. So when this lawsuit was filed,  
22 there were three additional plaintiffs other than  
23 yourself.

24 Do you understand that?

25 A. Yes.

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17

1 Q. Do you know the names of any of those other  
2 three plaintiffs?

3 A. Only -- the only one I remember is Brayden  
4 Stark. The other two I can't say I remember.

5 Q. Have you ever met Brayden Stark?

6 A. No.

7 Q. Have you ever spoken with Brayden Stark?

8 A. Nope.

9 Q. Did you ever meet with either the other two  
10 named plaintiffs?

11 A. No.

12 Q. Did you ever speak with either of the other  
13 two named plaintiffs?

14 A. No.

15 Q. Have you ever communicated with Brayden  
16 Stark by any means?

17 A. No.

18 Q. So you have filed a complaint in a lawsuit  
19 against Patreon correct?

20 MR. GAA: Objection to form.

21 THE WITNESS: Yes and no.

22 BY MR. WALKER:

23 Q. What's the "no"?

24 A. Not would be not me personally. The yes is  
25 in tandem with counsel.

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18

1 Q. Fair enough. You are a named plaintiff in  
2 a lawsuit against Patreon; correct?

3 A. Yes.

4 Q. What do you understand the lawsuit to be  
5 about?

6 A. I understand that it's about my personal

7 information being shared from Patreon to Meta via the  
8 Metapixel.

9 Q. What person information?

10 MR. GAA: Objection to form.

11 THE WITNESS: Namely my Facebook videos and  
12 videos watched on Patreon's platform.

13 BY MR. WALKER:

14 Q. Any other personal information?

15 MR. GAA: Objection to form.

16 THE WITNESS: Not that I can specifically  
17 remember.

18 BY MR. WALKER:

19 Q. Mr. Oostyen, do you believe that you have  
20 suffered injury as a result of any disclosure of your  
21 Facebook ID and videos that you watched on Patreon to  
22 Meta?

23 MR. GAA: Objection to form.

24 THE WITNESS: Yes.

25 BY MR. WALKER:

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19

1 Q. How?

2 A. Being a particularly private individual,  
3 it's not something I would have elected to have done.

4 Q. How have you been injured?

5 MR. GAA: Objection to form.

6 THE WITNESS: Could you expand on the  
7 question?

8 BY MR. WALKER:

9 Q. So you told me that you believe you've been  
10 injured --

11 A. Mm-hmm.

12 Q. -- as a result of Patreon's alleged  
13 disclosure of perm information of yours to Meta;  
14 correct?

15 A. Yes.

16 Q. And you told me that the personal  
17 information that you believe was disclosed was your  
18 Facebook ID and videos that you watched on Patreon;  
19 correct?

20 A. Mm-hmm.

21 Q. And then the question for you to: Do you  
22 believe you've been injured as a result of that alleged  
23 disclosure of information from Patreon --

24 A. Mm-hmm --

25 Q. -- to Meta?

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1 A. It's -- it's hard to quantify in a way that



2 I've been injured because it's not -- it's not  
3 necessarily information that you wanted a third party  
4 to have.

5 Q. Do you believe you've been injured as a  
6 result of that alleged disclosure?

7 A. Yes.

8 Q. How have you been injured?

9 A. I'm not entirely sure.

10 Q. Mr. Oostyen, what was the value -- strike  
11 that.

12 You've told me that you believe that  
13 Patreon disclosed to Meta your Facebook ID and videos  
14 that you watched on Patreon; correct?

15 A. Yes.

16 Q. And that's your personal information in  
17 your view; correct?

18 A. Yes.

19 Q. What was the value of that information  
20 prior to when you believed Patreon disclosed it to  
21 Meta?

22 MR. GAA: Objection to form.

23 THE WITNESS: As far as a -- I want to say  
24 a monetary value, I personally am unfit to -- to  
25 calculate that amount, but as far as a personal value,

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21

1 all of my personal information is something that I  
2 can't quantify or specifically define, but is  
3 infinitely value to me.

4 BY MR. WALKER:

5 Q. What was the value of the -- before the  
6 time --

7 A. Mm-hmm.

8 Q. -- you believe Patreon disclosed your  
9 personal information to Meta --

10 A. Mm-hmm.

11 Q. -- what was the value of the information  
12 that you believe was disclosed?

13 MR. GAA: Objection to form.

14 THE WITNESS: That's -- that's something  
15 that I'm unfit to quantify but either -- either now or  
16 in the future counsel will retain an expert who can do  
17 that.

18 BY MR. WALKER:

19 Q. Do you believe the -- the information had  
20 value before the time you believe Patreon disclosed it  
21 to Meta?

22 MR. GAA: Objection to form.

23 THE WITNESS: Yes.

24 BY MR. WALKER:

25 Q. Do you believe the value of that

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22

1 information has been or was diminished as a result of

2 Patreon's disclosure of it to Meta?

3 A. Again, something I -- I'm not fit to

4 calculate, but as I stated before --

5 Q. So whether or not your fit to calculate --

6 A. Mm-hmm.

7 Q. -- how much has been diminished, do you

8 believe it has been diminished.

9 MR. GAA: Objection to form.

10 THE WITNESS: I guess I wouldn't -- I

11 wouldn't know.

12 BY MR. WALKER:

13 Q. Has anybody ever offered you any money for

14 that information before this lawsuit?

15 A. No.

16 Q. Have you ever tried to place a value on

17 that information prior to this lawsuit?

18 MR. GAA: Objection to form.

19 THE WITNESS: I -- not monetarily.

20 BY MR. WALKER:

21 Q. Has anyone tried to place a value on that

22 information prior to this lawsuit by any other means?

23 MR. GAA: Objection to form.

24 THE WITNESS: The only individual would be  
25 myself personally, and personal value is immense.

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23

1 BY MR. WALKER:

2 Q. Mr. Oostyen, you've told me that you  
3 believe Patreon disclosed your Facebook ID and videos  
4 you watched on Patreon to Meta; correct?

5 A. Yes.

6 Q. Are there more people who know that  
7 information about you than did before Patreon  
8 purportedly disclosed that information to Meta?

9 MR. GAA: Objection to form.

10 THE WITNESS: Yes.

11 BY MR. WALKER:

12 Q. Who?

13 A. I'm sorry. I may have misunderstood your  
14 last question.

15 Q. You've told me that you believe Patreon  
16 disclosed --

17 A. Mm-hmm.

18 Q. -- your Facebook ID and videos you watched

19 on Patreon --

20 A. Mm-hmm.

21 Q. -- to Meta?

22 A. Yes.

23 Q. Correct.

24 A. Yes.

25 Q. Are there more people who know that

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24

1 information than did before Patreon purportedly

2 disclosed it to Meta?

3 A. Yes, I would assume yes.

4 Q. What would that assumption be based on?

5 A. It would be based on whoever may be over --

6 receiving the information from Patreon or from the

7 Metapixel at Meta.

8 Q. Do you have any basis to believe that an

9 actual human being has ever seen your Facebook ID and

10 the videos you watched on Patreon at Meta?

11 MR. GAA: Objection to form.

12 THE WITNESS: No.

13 BY MR. WALKER:

14 Q. I will restate it just to make sure that

15 the form was correct.

16 Do you believe -- strike that.

17                   Do you have any basis to believe that any  
18 human being at Meta has ever seen or looked at or  
19 actually accessed your Facebook ID and videos that you  
20 watched on Patreon?

21           A.     This, I wouldn't know. So, no.

22           Q.     Does it matter to you whether any human  
23 being at Meta ever actually looked at the data?

24           A.     No.

25           Q.     Why not?

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1           A.     Because they -- they have other systems and  
2 way to analyze and utilize that data.

3           Q.     What are -- what are those systems?

4           A.     I don't know. I know that they use  
5 personal information similar to that for advertising  
6 purposes and -- and whatnot.

7           Q.     Do you have any basis to believe that Meta  
8 has actually used your Facebook ID and the videos you  
9 watched on Patreon?

10          A.     No.

11          Q.     Mr. Oostyen, you have a Patreon account;  
12 correct?

13          A.     Yes.

14 Q. You created your Patreon account in 2021;  
15 correct?

16 A. I can't remember the -- the exact time  
17 frame in which I made it.

18 Q. Did you create your Patreon account in  
19 early 2021?

20 A. I can't remember when.

21 Q. Fair enough. Sometime in 2021 you created  
22 your Patreon account; correct?

23 A. Again, I don't remember. I don't remember  
24 the exact time frame.

25 (Exhibit No. 1 was marked

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1 for identification.)

2 BY MR. WALKER:

3 Q. All right. I'm going to hand you what has  
4 been marked Exhibit No. 1. This is Defendant's Exhibit  
5 No. 1?

6 A. Mm-hmm.

7 MR. WALKER: Reid, this is the same exhibit  
8 that was used in Mr. Stark's deposition.

9 Do you need a copy?

10 MR. GAA: If you have an additional one,  
11 that would be great. Thank you.

7 2021?

8 A. Yes.

9 Q. Why did you create your Patreon account?

10 A. To support a creator I was interested in  
11 supporting.

12 Q. Which creator?

13 A. I believe it is a creator that goes by the  
14 name of "Worthy Kids. "

15 Q. How did you first hear of worthy kids?

16 A. YouTube.

17 Q. Did you view worthy kids content on  
18 YouTube?

19 A. Yes.

20 Q. And you viewed worthy kids content on  
21 YouTube before you created your Patreon account?

22 A. Yes.

23 Q. You said that you wanted to support a  
24 creator that you were interested in; correct?

25 A. Yes.

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1 Q. What do you mean by support a creator?

2 A. Subscribing monthly payments.

3 Q. And after you created your Patreon



4 account --

5 A. Mm-hmm.

6 Q. -- did you subscribe to Worthy Kids on  
7 Patreon?

8 A. Yes.

9 Q. And did you -- over what period of time --  
10 strike that.

11 Over what period of time did you subscribe  
12 to Worthy Kids on Patreon?

13 A. I don't remember an exact period of time.  
14 I know it was for several months, but I was going  
15 through a lot of that time and lost track of payments.

16 Q. To prepare for your deposition here today,  
17 did you look at any documentations related to what  
18 creators you did or did not subscribe to on Patreon?

19 A. Yes. I did look at some.

20 Q. What documents were those?

21 A. I don't remember what they are called.

22 Q. Can you describe them for me?

23 A. I believe there was a spreadsheet. And  
24 then there was also a series of old emails.

25 Q. This spreadsheet you mentioned --

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1 A. Mm-hmm.

2 Q. -- do you know where that spreadsheet came  
3 from?

4 A. I do believe I remember now that that one  
5 was produced by Patreon.

6 Q. Okay. And then you mentioned old emails?

7 A. Mm-hmm.

8 Q. Were those your e-mails?

9 A. Yes.

10 Q. Did you look at any other documents related  
11 to -- related to which creators you did or didn't  
12 subscribe to on Patreon?

13 MR. GAA: Objection to form.

14 THE WITNESS: None that I remember.

15 MR. WALKER: Counsel, we would ask that the  
16 emails that the witness referred to here be produced to  
17 the extent they haven't already.

18 MR. GAA: Understood. We will look into  
19 that.

20 BY MR. WALKER:

21 Q. You told me earlier you had watched Worthy  
22 Kids's content on YouTube before you created your  
23 Patreon account?

24 A. Yes.

25 Q. Do you have a Google account?

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1 A. Yes.

2 Q. And when you watched video on YouTube, are  
3 you logged into your Google account?

4 A. Yes.

5 Q. When you watched Worthy Kids content on  
6 YouTube, did you ever comment on the content?

7 A. I don't believe so.

8 Q. Did you ever click a like button for the  
9 content on YouTube?

10 A. There is a possibility.

11 Q. Have you ever viewed Worthy Kids's content  
12 anywhere else other than on YouTube?

13 A. Yes.

14 Q. Where?

15 A. Instagram and Patreon.

16 Q. When you created your Patreon account, you  
17 had to content to the Patreon terms of use; correct?

18 A. Yes.

19 Q. And in fact you did content to the Patreon  
20 terms of use; correct?

21 A. Yes.

22 Q. Did you review the Patreon terms account --  
23 strike that.

24 Have you ever reviewed the Patreon terms of  
25 use?

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1 A. No.

2 Q. Have you ever reviewed any portion of the  
3 Patreon terms of use?

4 A. No.

5 Q. Whether or not you've reviewed any portion  
6 of the Patreon terms of use, you agree that you  
7 accepted them; correct?

8 A. Yes.

9 Q. And you agree that you're bound by them;  
10 correct?

11 A. Correct.

12 Q. And if the Patreon terms of use contain a  
13 consent to the disclosure of your information, you're  
14 agreeing to that, too correct?

15 MR. GAA: Objection to form.

16 THE WITNESS: From what I understand, it  
17 depends on the circumstances of the agreement.

18 BY MR. WALKER:

19 Q. What is that understanding?

20 A. That the concerning information that has  
21 been shared, that that information required a separate

22 content.

23 Q. Separate from?

24 A. The terms of use.

25 Q. Do you know whether the Patreon terms of

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1 use contain a content to the disclosure of your

2 information?

3 A. No.

4 Q. If the Patreon terms of use contain a

5 consent -- strike that.

6 If the Patreon terms of use disclose to you

7 that Patreon could disclose your information related to

8 your use of Patreon to third parties, would you drop

9 your complaint in this lawsuit against Patreon?

10 A. No.

11 Q. Why not?

12 A. Again, to my understanding, the information

13 that was shared requires a separate form of consent.

14 Q. And it's significant to you that there be a

15 separate form of consent?

16 A. Yes.

17 Q. Why?

18 A. Because I -- it would give me the

19 opportunity to choose whether or not I consented to it  
20 specifically.

21 Q. But you didn't read the Patreon terms of  
22 use?

23 A. No.

24 Q. You didn't check to see whether the Patreon  
25 terms of use contained any consent to the disclosure of

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1 your information?

2 A. That's correct.

3 Q. Do you understand that Patreon in addition  
4 to the terms of use also has a privacy policy?

5 A. Yes.

6 Q. Have you ever looked at the Patreon privacy  
7 policy?

8 A. I don't believe I did.

9 Q. Did you ever look at the Patreon privacy  
10 policy before you filed this lawsuit?

11 A. No.

12 Q. Did you ever look at the Patreon privacy  
13 policy after you filed this lawsuit?

14 A. I don't think I did, no.

15 Q. Do you understand that Patreon has a cookie  
16 policy?

17 A. Yeah.

18 Q. Have you ever been looked at the Patreon  
19 cookie policy?

20 A. No.

21 Q. Mr. Oostyen, you have a Facebook account;  
22 correct?

23 A. Yes.

24 Q. And did you personally create your Facebook  
25 account?

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1 A. Yes.

2 Q. When?

3 A. I don't remember exactly when. It was --  
4 the earliest that I can attest to is before 2016.

5 Q. Is it your testimony you created your  
6 Facebook account in 2016?

7 A. It would be predating.

8 Q. Some time before 2016?

9 A. Yes.

10 Q. Okay. When you created your Facebook  
11 account, you agreed to the Facebook terms of use;  
12 correct?

13 A. Yes.

14 Q. Have you ever read any portion of the  
15 Facebook terms of use?

16 A. I don't believe so.

17 Q. Do you know whether the Facebook terms of  
18 use contains a consent that allows Facebook to disclose  
19 your personal information related to your use of  
20 Facebook?

21 A. No, I don't know.

22 Q. Do you know whether the Facebook terms of  
23 use include disclosures about what information Facebook  
24 collects about you when you're on the internet?

25 A. Again, I don't know.

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1 Q. You understand that on line platforms  
2 sometimes update their terms of use --

3 A. Yes.

4 Q. -- correct?

5 A. Yes.

6 Q. In the last four years, have you ever  
7 clicked on anything whereby you agreed to Facebook's  
8 updated terms of use?

9 MR. GAA: Objection to form.

10 THE WITNESS: Not that I can recollect, but  
11 most likely.



12 BY MR. WALKER:

13 Q. Have you ever read any portion of  
14 Facebook's updated terms of use?

15 A. Not in detail.

16 Q. Have you ever read any portion of  
17 Facebook's terms of use at all?

18 A. I may have skimmed one of the documents,  
19 but, again, not in detail.

20 Q. Do you actually recall skimming Facebook  
21 terms of use?

22 A. Not a specific date, but I do remember  
23 looking over it once.

24 Q. When was that?

25 A. Most likely the last time I was asked to

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1 accept an update.

2 Q. When was that?

3 A. I can't recall.

4 Q. Was it in the last year?

5 A. I believe so.

6 Q. Do you recall what portion of the Facebook  
7 updated terms that you looked at?

8 A. No.

9 Q. Did you look to see whether the updated  
10 Facebook terms of use contained any form of consent  
11 that allowed Facebook or Meta to disclose your  
12 information about your use of Facebook to others?

13 A. No.

14 Q. You didn't check?

15 A. I didn't -- didn't check.

16 Q. It wasn't important to you?

17 MR. GAA: Objection to form.

18 THE WITNESS: It was not what I was focused  
19 on at that very moment.

20 BY MR. WALKER:

21 Q. What were you focused on?

22 A. Reactivating the Facebook account as I had  
23 lost the password.

24 Q. You told me earlier that you understand  
25 that in order to did you say close your Facebook ID and

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1 the videos that you watched on Patreon, that the  
2 consent would need to be in a separate form or  
3 document.

4 Do you recall that testimony?

5 A. Yes.

6 Q. Mr. Oostyen, when you signed up for Patreon

7 in 2021 -- correct?

8 A. Yes.

9 Q. If Patreon had provided to you a form that  
10 asks you to consent to allow Patreon to disclose your  
11 video viewing history on Patreon to Meta, would you  
12 have consented?

13 MR. GAA: Objection to form.

14 MR. WALKER: Strike that.

15 BY MR. WALKER:

16 Q. If in 2021, when you signed up for your  
17 Patreon account --

18 A. Mm-hmm.

19 Q. -- if Patreon had given you a separate form  
20 or document under which you were given an opportunity  
21 to consent to allow Patreon to disclose your video  
22 viewing history on Patreon to Meta, would you have  
23 consented?

24 A. Most likely, no.

25 Q. Why is that?

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1 A. I -- I would have likely read the document  
2 or the agreement presented to me because I would have  
3 found it unusual to receive the -- the second

2           A.     Around the -- the last two, two and a half  
3 years, roughly.

4           Q.     When did you first take steps to prevent  
5 websites from installing cookies on your browser?

6           A.     It would have been some time in either 2020  
7 or 2021.

8           Q.     Okay. What did you do in -- what have you  
9 done to prevent websites from installing cookies on  
10 your browser?

11          A.     I guess it depends on the website itself.  
12 Most of them have a little pop up, right, you can  
13 accept, reject or -- fortunately some of them have now  
14 have -- like, you can select how much, basically,  
15 access to that ability they have.

16          Q.     Have you ever taken any steps with respect  
17 to the settings on your browser to control what cookies  
18 would be installed on your browser?

19          A.     Minimally.

20          Q.     What steps, if any, have you taken?

21          A.     None that I remember exactly.

22          Q.     Do you recall any?

23          A.     I do. It's so long ago, I don't remember,  
24 again, exactly what I did.

25          Q.     Okay. How long ago?

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1           A.     Again, that would have been probably 2021.

2           Q.     So you created your Patreon account in  
3 2021; right?

4           A.     Yes.

5           Q.     And you were aware of the existence of  
6 cookies at the time you created your Patreon account;  
7 correct?

8           A.     Yes.

9           Q.     And when you created your Patreon account,  
10 did you have an understanding one Waugh or the other as  
11 to whether there were cookies that could be installed  
12 on your browser by one website that would track what  
13 you did on a different website?

14          A.     No.

15          Q.     Do you have an understanding about that one  
16 Waugh or the other now?

17          A.     A very surface-level understanding.

18          Q.     What is your understanding?

19          A.     I guess, mostly the -- you know, that's a  
20 possibility that they exist, and that websites do use  
21 them.

22          Q.     And when did you first come to understand  
23 that there are cookies that can be installed on your

24 browser by one website that track what you do on a  
25 different website?

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1 A. Again, not -- not a specific time frame,  
2 but most likely -- not most likely, but within the last  
3 year I became more familiar with that.

4 Q. Did you become aware of that before you  
5 filed this lawsuit?

6 A. No.

7 Q. So you've --

8 A. I guess, the cookies correct.

9 Q. So --

10 A. Yeah.

11 Q. -- did you first come to understand before  
12 this lawsuit was filed that there are cookies that can  
13 be installed on your browser by one website that can  
14 track what you do on another website?

15 A. The answer is still no.

16 Q. Did you come to that understanding after  
17 the lawsuit was filed?

18 A. Yes.

19 Q. How did you come to that understanding?

20 A. Not that I've done extensive research or  
21 anything, but I came through it passively through just

22 gaining general knowledge about cookies and how they  
23 function.

24 Q. Did you read something that causes you to  
25 come to this understanding?

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1 MR. GAA: Objection to form.

2 THE WITNESS: Yes, yes.

3 BY MR. WALKER:

4 Q. What did you read?

5 A. An article on the internet. I don't  
6 remember exact details.

7 MR. WALKER: I think this would be a good  
8 time to take a first break.

9 VIDEOGRAPHER: We are going off the record.  
10 The time is 10:50.

11 (Recess was taken.)

12 VIDEOGRAPHER: We are back on the record.  
13 The time is 11:00.

14 BY MR. WALKER:

15 Q. Mr. Oostyen, during the break, did you  
16 speak with your counsel?

17 A. Briefly.

18 Q. Did you talk to them about the testimony

19 that you've given in this deposition?

20 A. Nope.

21 Q. Did you talk to them about the questions

22 that I've asked?

23 A. Nope.

24 Q. Did you talk to them about the questions

25 that I might ask --

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1 A. No.

2 Q. -- later in the deposition?

3 A. No.

4 Q. I asked you earlier about cookies, and you

5 told me that you had sometimes are presented with the

6 opportunity to either consent to cookies or to decline

7 cookies when you're on line?

8 A. Yes.

9 Q. Do you recall that testimony?

10 A. Yes.

11 Q. Have you ever consented to allow cookies?

12 A. Oh, there are times, yes.

13 Q. And have you, sometimes, declined cookies?

14 A. Yes.

15 Q. On what basis -- strike that.

16 For which websites have you declined



17 cookies?

18 A. Mostly websites I'm unfamiliar with or find

19 a passing. A good number of this.

20 Q. Do you recall any particular?

21 A. No, no specifics.

22 Q. Other than whether or not you're familiar

23 with a site, are there any other bases that have caused

24 you in the past to decline cookies?

25 A. Yes, based on the credibility of the

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1 website as well.

2 Q. Okay. Are there any other bases that would

3 cause you to decline cookies?

4 A. None that I can recall at this moment.

5 Q. Okay. And since 2020, you've been familiar

6 with the Patreon website correct?

7 A. Yes.

8 Q. And since 2020, you've been familiar with

9 the Facebook site?

10 A. Yes.

11 Q. In your view, do you consider Patreon to be

12 a credible website?

13 A. Patreon itself, yes.